

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

|                           |   |                                 |
|---------------------------|---|---------------------------------|
| UNITED STATES OF AMERICA, | ) |                                 |
|                           | ) |                                 |
| Plaintiff                 | ) | CRIMINAL ACTION NO: 17-10243-IT |
|                           | ) |                                 |
| v.                        | ) |                                 |
|                           | ) |                                 |
| CHRISTOPHER CONDRON,      | ) |                                 |
|                           | ) |                                 |
| Defendant                 | ) |                                 |
|                           | ) |                                 |

DEFENDANT CHRISTOPHER CONDRON'S  
ASSENTED TO MOTION FOR LEAVE TO FILE  
MOTIONS *IN LIMINE* AND RESPONSES TO GOVERNMENT'S MOTIONS

Now comes Christopher Condron, the defendant in the above-captioned matter, and moves for leave to respond to the Government's motions *in limine* and to file his own motions *in limine*. Mr. Condron requests that the hearing on motions *in limine* be continued to a mid-October date and that the deadline for filing motions be extended to September 26, 2019. Assistant U.S. Attorney Neil Gallagher assents to this motion.

As reason therefore, Counsel states that she is new to the case and that discovery on this case been voluminous. She requires additional time to prepare her defense and does not want to file trial motions prior to having that defense ready. Additionally, Mr. Condron has strong ideas and opinions about the case against him and his defense which are valid and deserve careful review by his counsel. It is the impression of Counsel that Mr. Condron felt that his prior counsel did not adequately address his ideas and opinions about the case which resulted in a breakdown in their relationship. Given that Mr. Condron is now represented by his third attorney, Counsel is diligently trying to address his concerns so that there isn't a similar breakdown that could cause further

delay for the Court. Proceeding with motion practice without addressing these issues will result in conflict with Mr. Condrón. Counsel fully anticipates being ready to proceed to trial as scheduled in December.

Counsel cannot represent Mr. Condrón effectively under the current schedule and requires additional time to prepare the defense. A further explanation of this request will be provided in an affidavit filed *ex parte* and under seal to the Court. The Government's attorney has been provided with a brief summary of the concerns raised in the affidavit.

Respectfully submitted,  
CHRISTOPHER CONDRÓN,  
By his Attorney,

/s/Keren Goldenberg  
Keren Goldenberg  
BBO #657629  
19A Alexander Ave.  
Belmont, MA 02478  
(617) 431-2701  
keren@kgdefenselaw.com